

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CAROLYN GARDNER

v.

C.A. No. 22-1034

KUTZTOWN UNIVERSITY, *et al.*

PLAINTIFF'S MOTION FOR ATTORNEYS FEES AND COSTS

Pursuant to Section 794a of the Rehabilitation Act of 1973 and 42 U.S.C. §1988, Plaintiff Carolyn Gardner, through her undersigned counsel, respectfully moves the Court for an award of attorneys fees and costs in connection with the above-captioned lawsuit. For all the reasons set forth in the attachments to this Motion and the Memorandum of Law, Plaintiff is the prevailing party, and is entitled to reimbursement of all reasonable costs and attorneys fees she and his attorneys incurred in the successful prosecution of her case.

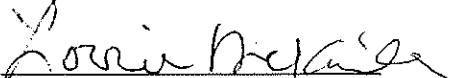
The adjusted lodestar for which Plaintiff is seeking reimbursement is \$942,045.00 as follows:

McKinley & Ryan, LLC	\$829,600.00
Ralph Lamar, Esquire	\$118,140.00

Plaintiff is also seeking \$5023.90 in litigation costs as evidenced in the Appendix to this Motion, Exhibit C.

Respectfully submitted,

By:


LORRIE MCKINLEY
McKINLEY & RYAN, LLC
238 West Miner Street
West Chester, PA 19382
(610) 436-6060

RALPH LAMAR

4728 Hamilton Blvd.
Allentown, PA 18103
610-563-0726

Attorney for the Plaintiff

Attorney for the Plaintiff

DATE: February 4, 2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAROLYN GARDNER

Plaintiff : CIVIL ACTION
: NO. 22-1034
v.
KUTZTOWN UNIVERSITY, *et al.* :

APPENDIX TO PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

- Exhibit A Declaration of Lorrie McKinley, Esquire
- Exhibit B Curriculum Vitae for Lorrie McKinley, Esquire
- Exhibit C Invoice, McKinley & Ryan, LLC for Stephen Oross
- Exhibit D Summary of Costs and Invoices
- Exhibit E Declaration of Ralph Lamar, Esquire
- Exhibit F Lamar Invoice for Stephen Oross
- Exhibit G Community Legal Services Fee Schedule, January 19, 2023
- Exhibit H Declaration of Marc Weinstein, Esquire
- Exhibit I Declaration of Scott Pollins, Esquire
- Exhibit J Declaration of Brian Foley, Esquire

DATE: February 4, 2025

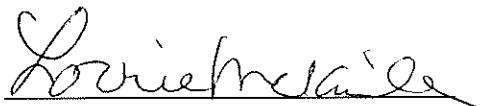
CERTIFICATE OF SERVICE

I hereby certify that on this date, February 4, 2025, a true and correct copy of the foregoing Plaintiff's Motion for Attorneys Fees and Costs and the corresponding Memorandum of Law and Appendix was served upon counsel by way of the Court's ECF system as follows:

Kevin Bradford, Esquire
Senior Deputy Attorney General

Matthew Skolnik, Esquire
Senior Deputy Attorney General

Pennsylvania Office of Attorney General
Eastern Regional Office, Civil Litigation Section
1600 Arch Street, Suite 300
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LORRIE McKINLEY, ESQUIRE